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August 9, 2023

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 08/22/2023

**Re: *International Flight Resources, LLC v. Aufiero* (Case No. 1:21-CV-03029-VSB),
Request for Leave to File Under Seal**

Dear Judge Broderick:

The firm represents Defendants Wells Fargo & Co. and Wells Fargo Merchant Services, LLC (collectively, “Wells Fargo”) in the above-captioned action. Pursuant to Rule 5(b)(ii) and 5(b)(iii) of Your Honor’s Individual Rules & Practices in Civil Cases, Wells Fargo submits this letter motion seeking leave to file certain documents under seal. Specifically, Wells Fargo respectfully requests permission to redact the highlighted portions of Exhibit 1 to Katherine Garland’s Declaration in Support of Wells Fargo’s Renewed Motion to Dismiss, and the Memorandum of Law in Support of Wells Fargo’s Renewed Motion to Dismiss (collectively, the “Motion to Dismiss Papers”). Wells Fargo has attempted to meet and confer with Plaintiff’s counsel pursuant to Rule 5(iii)(a), but has not received a response.

The Motion to Dismiss Papers contain highly sensitive and confidential information, including the terms of a Settlement Agreement that is subject to a confidentiality provision. The Papers likewise include non-public, business information reflecting Wells Fargo’s debt negotiation and settlement strategy. This information is identical to information that this Court previously permitted Wells Fargo to file under seal in connection with its initial Motion to Dismiss. *See, e.g.*, ECF No. 37 (granting Wells Fargo’s prior motion to seal).

For the foregoing reasons, Wells Fargo respectfully requests that the Court permit Wells Fargo to redact the Settlement Agreement terms contained within its Renewed Motion to Dismiss.

Respectfully submitted,

/s/ Katherine A. Garland

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